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Large Coating, Printing and	PROCESSED BY	GS
Aerospace Operations Team	REVIEWED BY	SMKE
APPLICATION PROCESSING AND CALCULATIONS	DATE	9/24/08

**TITLE V PERMIT
SECTION H REVISION**

Applicant's Name

HONEYWELL INTERNATIONAL INC

Company I.D.

800003

Mailing Address

2525 W. 190TH ST.
TORRANCE, CA 90504-6061

Equipment Address

2525 W. 190TH ST.
TORRANCE, CA 90504-6061

EQUIPMENT DESCRIPTION

APPLICATION NO. 475870

Title V deminimis significant permit revision

PROJECT SUMMARY

Honeywell International (I.D. 800003) has proposed to revise their Title V permit by:

1. Installing a new portable plasma arc cutter (D213), and modifying/changing permit conditions on an existing stationary plasma arc cutter (D199).
2. Modifying/changing permit conditions on 5 test cells (D124, D125, D126, D127 & D128)
3. Installing a new nitric acid cleaning tank (D214)

As a result, a total of 8 applications were submitted for all changes to be included in this Title V permit revision. These applications are summarized as follows:

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Appl. No.	Equipment	Device No.	Proposed Changes	Permit Action
475870	Title V Permit Revision			
475879	Portable Plasma Arc Cutter	D213	New construction	PC
475881	Stationary Plasma Arc Cutter	D199	Modification/change of condition to cut metals with a higher Ni and Cr content and install an operating timer	PC
475882	Test Cell No. 4	D125	Modification/change of condition to remove the hourly JP fuel usage limitation, add natural gas, ethane and methane as additional fuels, and install a gas fuel meter	PC
475895	Test Cell No. 5	D126		PC
475896	Test Cell No. 6	D127		PC
475898	Test Cell No. 7	D128		PC
476237	Test Cell No. 3	D124		PC
486027	Nitric Acid Cleaning Tank	D214	New construction	PC

The detailed description and evaluation for the proposed changes are included in the respective permit application folder (see attached permit evaluations – there are three separate evaluations for the three projects).

REGULATION XXX:

This facility is in the RECLAIM program. The proposed project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or hazardous air pollutants (HAPs) for this facility.

Non-RECLAIM Pollutants or HAPs

Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or HAPs from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO _x *	40
PM ₁₀	30
SO _x *	60
CO	220

* Not applicable since this is a RECLAIM pollutant

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To determine if a project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the Title V renewal permit shall be accumulated and compared to the above threshold levels. This proposed project is the 2nd permit revision to the Title V renewal permit issued to this facility on September 22, 2004. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V permit renewal was issued:

Revision No.	Revision Description	HAP	VOC	NOx*	PM ₁₀	SOx	CO
2 nd Permit Revision	install new portable plasma arc cutter (D213) & modify/change conditions on a stationary plasma arc cutter (D199)	0	0	0	0	0	
	modify/change conditions on five test cells (D124, D125, D126, D127 & D128)	0	0	0	0	0	0
	install new nitric acid cleaning tank (D214),	0	0	0	0	0	0
1 st Permit Revision-	admin. change to remove devices D37, D69, C70, C71 & C72 and update the responsible official	0	0	0	0	0	0
Cumulative Total		0	0	0	0	0	0
Maximum Daily		30	30	40*	30	60	220

* RECLAIM pollutant, not subject to emission accumulation requirements

Since the cumulative emission increases resulting from all permit revisions are not greater than any of the emission threshold levels, this proposed project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or HAPs.

RECLAIM Pollutants

Rule 3000(b)(12)(A)(v) defines a “minor permit revision” as any Title V permit revision that does not result in an emission increase of RECLAIM pollutants over the facility starting Allocation plus nontradeable Allocations, or higher Allocation amount which has previously undergone a significant permit revision process.

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Since NO_x is a RECLAIM pollutant for this facility, a separate analysis shall be made to determine if the proposed permit revision is considered a “minor permit revision” for RECLAIM pollutants. Given that the proposed modification will not result in an emission increase in NO_x emissions, the proposed project is considered as a “minor permit revision” for RECLAIM pollutants.

RECOMMENDATION

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or hazardous air pollutants (HAPs), and a “minor permit revision” for RECLAIM pollutants, it is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V/RECLAIM Permit shall be issued with the above equipment in Section H as Permits to Construct.